

# **EXHIBIT – B**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

S U M M O N S

ADAM JBRAH,

Plaintiffs,

-against-

KENAN ADVANTAGE GROUP, INC.  
and FREDERICK NAPIER,

Defendants.

INDEX NO.:

FILED:

Plaintiff designates KINGS County as the  
place for trial.


The basis of the venue is location of the  
incident:

TO THE DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

DATED: June 30, 2021  
New York, New York

Yours, etc.

  
Bryan J. Swerling, Esq.  
LAW OFFICE OF BRYAN J. SWERLING, P.C.  
Attorneys for Plaintiffs  
**ADAM JBRAH**  
15 Maiden Lane, Suite 2005  
New York, New York 10038  
(212) 571-5757

TO:  
**KENAN ADVANTAGE GROUP, INC.**  
c/o CT Corporation System  
4400 Easton Commons Way, Suite 125  
Columbus, Ohio 43219

**FREDERICK NAPIER**  
1223 Knossos Drive  
Whitehall, Pennsylvania 18052

SUPREME COURT OF THE STATE OF NEW YORK  
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PURCHASED:

VERIFIED COMPLAINT

Plaintiff **ADAM JBRAH** ("Plaintiff") complaining of Defendants **KENAN ADVANTAGE GROUP, INC. ("KAG")** and **FREDERICK NAPIER ("Napier")**, upon information and belief, respectfully alleges as follows:

1. That at all times hereinafter complained of Plaintiff was and still is a natural person residing in the County of Kings, State of New York.
2. That at all times hereinafter complained of, Defendant KAG was a foreign for-profit corporation with a primary business location at 4366 Mt. Pleasant Street NW, North Canton, Ohio 44720.
3. That at all times Defendant NAPIER was and still is a natural person residing in the County of Lehigh, State of Pennsylvania.
4. That at all times hereinafter mentioned, Defendant KAG was the owner of a 2019 Peterbilt truck vehicle bearing State of Ohio license plate PWH1125.
5. That at all times hereinafter mentioned, Defendant NAPIER was the operator of said 2019 Peterbilt truck vehicle bearing license plate PWH1125.

6. That at all times herein mentioned, Defendant NAPIER was operating said 2019 Peterbilt truck vehicle bearing license plate PWH1125 with the knowledge, permission and consent of Defendant KAG.

7. That on January 21, 2020, Plaintiff was operating a 2016 Toyota motor vehicle bearing New York State license plate T754327C.

8. That at all times mentioned herein, the intersection of Leonard Street and Brooklyn Queens Expressway was a public roadway in the County of Kings, City and State of New York.

9. That on January 21, 2020, Plaintiff was operating said Toyota motor vehicle at approximately 1:00 a.m. on the Brooklyn Queens Expressway in the vicinity of Leonard Street in the County of Kings, City and State of New York.

10. That at said time and said place., the vehicle being operated by Defendant NAPIER came in contact with Plaintiff's vehicle.

11. That as a result of the foregoing, Plaintiff was injured.

12. That on January 21, 2020, Plaintiff was injured.

13. That as a result of the foregoing, Plaintiff was caused to sustain serious injuries.

14. That the occurrence and the resulting injuries were caused solely by the negligence of the Defendants.

15. By reason of the forgoing, Plaintiff was rendered sick, sore, lame and disabled; was caused to sustain serious, protracted and permanent injuries; was confined to bed and home; did seek and continues to seek medical attention and aid; and sustained other injuries and damages.

16. That as a result of the foregoing, Plaintiff has been damaged in a sum that exceeds the jurisdiction of all lower courts and is within the jurisdiction of this court.

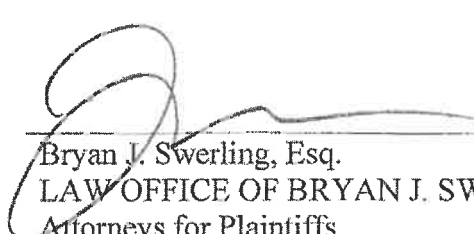
17. Plaintiff has sustained serious injuries as defined in subdivision (d) of §5102 of the Insurance Law and/or economic loss greater than basic economic loss as defined in subdivision (a) of §5102 of the Insurance Law, as amended, effective 1984.

18. That Plaintiff's action falls within one or more of the exceptions set forth in CPLR §1602, including but not limited to CPLR §1602(6).

WHEREFORE, Plaintiff respectfully demands judgment in an amount that exceeds the jurisdiction of all lower Courts together with the costs and disbursements of this action.

DATED: June 30, 2021  
New York, New York

Yours, etc.



Bryan J. Swerling, Esq.  
LAW OFFICE OF BRYAN J. SWERLING, P.C.  
Attorneys for Plaintiffs  
**ADAM JBRAH**  
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**FREDERICK NAPIER**  
1223 Knossos Drive  
Whitehall, Pennsylvania 18052

NYSCEF DOC. NO. 1

### ATTORNEY VERIFICATION

[illegible]

I, the undersigned, an attorney admitted to practice in the Courts of New York State, state that I am the own the LAW FIRM OF BRYAN J. SWERLING, P.C., am attorney for Plaintiff in the within action. I have read the foregoing Complaint and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated alleged on information and belief, and as to those matters I believe it to be true. The reason this verification is made by me and not by Plaintiff is because Plaintiff is not now within the County where deponent maintains his offices.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows:

Conversations with Plaintiff and a review of the file maintained at my offices on this matter.

I affirm that the foregoing statements are true, under the penalties of perjury.

DATED: June 30, 2021  
New York, New York

**Bryan J. Swerling, Esq.**

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**SUMMONS & VERIFIED COMPLAINT**

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THE LAW OFFICE OF BRYAN J. SWERLING, P.C.  
Attorneys for Plaintiffs  
Office and Post Office Address, Telephone  
15 Maiden Lane, Suite 2005  
New York, New York 10038  
(212) 571-5757

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Signature Pursuant to Rule 130-1.1-a



Bryan J. Swerling

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